

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	CASE NO. 12-00493 MCF
EFRAIN RODRIGUEZ OSORIO	*	CHAPTER 13
LILLIAM CUMBA SANTANA	*	
DEBTORS		

**DEBTORS' REPLY TO *MOTION FOR DISMISSAL*
FILED BY SCOTIABANK PUERTO RICO DOCKET NO. 73**

TO THE HONORABLE COURT:

COME NOW, EFRAIN RODRIGUEZ OSORIO and LILLIAM CUMBA SANTANA, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. Scotiabank Puerto Rico ("Scotiabank") filed a *Motion for Dismissal*, based on the allegation that the debtors are in arrears in three (3) post-petition mortgage loan payments to Scotiabank. *Motion for Dismissal*, paragraph 4, docket no. 73.

2. The debtors respectfully submit that they are making current monthly mortgage loan payments to Scotiabank. Attached is copy of receipts issued by Scotiabank from June, 2014 through October, 2014, which reflect that the debtors are making current monthly mortgage loan payments to Scotiabank.

3. The attached receipts reflect the following:

---June, 2014	-----	paid on June 20, 2014;
---July, 2014	-----	paid on July 16, 2014;
---August, 2014	-----	paid on August 18, 2014;
---September, 2014	-----	paid on September 28, 2014;
---October, 2014	-----	paid on October 31, 2014;

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3. The debtors respectfully submit that they are up-to-date in the post-petition mortgage loan payments to Scotiabank. Payments to the Trustee on the confirmed Plan are also up-to-date.

4. Based on the aforestated, the debtors respectfully request this Honorable Court deny Scotiabank's motion for dismissal, docket no. 73.

WHEREFORE, debtors respectfully request this Honorable Court Order deny the *Motion for Dismissal* filed by Scotiabank, docket no. 73.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., Wallace Vazquez Sanabria, Esq., Counsel for Scotiabank Puerto Rico; I also certify that a copy of this motion was sent via US Mail to Efrain Rodriguez Osorio and Lilliam Cumba Santana, Lomas del Sol 53 Casiopea Street Gurabo PR 00778, debtors in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 2nd day of December, 2014.

/s/Roberto Figueroa Carrasquillo
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